

Applicant : H.S. Roy and Jeff Young
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REMARKS

Claims 1-10, 12-15, 18, 22-25, 27-29, and 31-48 are pending in the application at this time. Claims 1, 27, and 31 are independent claims. Claims 1, 4, 12, 23, 25, 27-29, 31-33, 35, 37, 38-46, have been amended. Claim 20 has been cancelled. Reconsideration is requested based on the amendments and the following remarks.

1. Interview Summary

The applicant respectfully thanks Examiner Romero for the courtesies extended during the telephone interview on December 2, 2003, which was attended by Examiner Romero and the applicant's undersigned representative. During the interview, the applicant's representative discussed the invention's provision of placeholders having representative content, and particularly that the representative content is replaced in a presentation mode by generated content, where both the representative content and generated content are presented according to formatting information associated with the representative content. No agreement was reached.

2. Response to Objections Under 35 USC §132

The Examiner objects to claims 1, 12, 13, 23, 28, 29, 32, 33, 35, 37, 38, 40, 41, 44, 45, and 48 because of the added claim limitation "variable content" placeholders. In addition, the Examiner appears to have objected to claims 1, 27, and 31, 32, 35, 40, and 48 because of the added claim limitation "presenting the representative content according to the associated formatting information."

The limitation "variable content" has been deleted from amended claims 1, 12, 13, 23, 27-29, 31, 32, 37, 39, 41, 44, and 45. The applicant believes that the Examiner's objections regarding the added claim limitation "variable content placeholders" are rendered moot by the amendments.

Regarding the limitations directed to presenting the representative content according to the formatting information in claims 1, 27, and 31, 32, 35, 40, and 48, the specification explains that the present invention provides a WYSIWYG system in which designers can design a page

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in, e.g., HTML and use the format, layout, and styles of the HTML to format, layout, and style dynamic content. *See* page 5, line 23 - page 6, line 1. To do so, the designer lays out a page with mock content placeholders and formats the mock content placeholders to visually design the page exactly the way it should appear to the designer. *See* page 7, lines 18-26. In an edit mode, the use of a WYSIWYG editor lets designers see exactly how their designs look on different platforms and browsers. *See* page 6, lines 17-18. The applicant submits that the description of the invention as being implemented in a WYSIWYG (*i.e.*, "*what you see is what you get*") system, particularly in the context of an HTML implementation in which the format, layout, and style of the HTML representative content is used to format, layout, and style generated dynamic content, clearly supports the claim's recitation of presenting the representative content according to the formatting information. Accordingly, these limitations do not represent new matter.

3. Response to Objections Under 37 CFR 1.75

The Examiner objected to claim 7 as being a substantial duplicate of claim 20. Claim 20 has been cancelled. The applicant believes that cancellation of claim 20 adequately addresses the Examiner's objection.

4. Rejections Under Section 35 USC §102(b)

Claims 1-7, 12-15, 18, 20, 22, 27-28, 31, 34, 36, 39, 42, 43, 46, and 47 stand rejected under 35 U.S.C. 102(b) as being anticipated by International Patent No. WO 99/22313, published on 05/1999, to Warmus et al. ("Warmus"). Claim 20 has been cancelled, rendering the rejection moot as to that claim. As to the rest of the claims, the applicant respectfully traverses the rejection.

a. Claim 1-7, 12-15, 18, 20, 22, 34, and 36

Amended claim 1 recites a method for generating a document. The method comprises inserting one or more placeholders in the document, and binding each placeholder to a content source. Each placeholder has representative content, and the representative content has

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associated formatting information. The method includes presenting the representative content of the placeholders according to the associated formatting information. The content for each placeholder is generated based on a corresponding content source. In a presentation mode, the representative content of the placeholder is replaceable by content generated based on the content source bound to the placeholder, and the generated content is presented according to the formatting information associated with the corresponding representative content.

Warmus discloses a method for producing different versions of books and/or customized books within a single press run. Page 2, lines 1-3. In Warmus, one or more template files are developed for the different books or book versions specifying the content (including appearance) of fixed information and the positioning of all information (i.e., fixed and variable). Page 23, line 32 -- Page 24, line 3. Variable information for a book can include variable text elements, variable image elements, and variable graph elements. In Warmus, the user identifies the database fields in the variable database to be used for the variable text, image, and graph elements. Page 28, lines 25-27. For variable text elements, a name or an indication of the appropriate field in the database is placed in the template file. Page 28, lines 29-33. For variable image elements, a dummy picture file and an indication of the proper database field to be used for the variable image element is inserted in the template file. Page 29, lines 10-13. A user viewing the page on a computer display will see the dummy picture file and the indication of the database field at the insertion point. Page 29, lines 13-18. For variable graph elements, an image box is created at the selected area of the page, and a text box is layered over the image box. The graph parameters and data pairs representing the graph data are stored in the text box. The graph parameters include the type of graph (i.e., bar graph or pie chart) as well as size, labels, colors, etc.

Warmus does not disclose placeholders having a representative content, with the representative content having associated formatting information, where the representative content of the placeholders is presented according to the corresponding associated formatting information. Warmus does not disclose a presentation mode, where the representative content of the placeholder is replaced by content generated based on a content source bound to the

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placeholder, and the generated content is presented according to the formatting information associated with the corresponding representative content. Instead, in Warmus, the placeholders are displayed as area data representing any areas on the page where variable information is to be reproduced. Page 24, lines 18-19. Because Warmus fails to disclose at least these limitations of claim 1, the reference cannot anticipate that claim. For at least these reasons, claim 1 is allowable over Warmus. Claims 2-7, 12-15, 18, 22, 34 and 36 depend directly or indirectly from claim 1 and are therefore allowable for at least the same reasons.

b. Claim 7

Claim 7 is allowable over Warmus for at least the following additional reason. As amended, claim 7 includes embedding the code as attributes in the placeholder. As described above, Warmus discloses creating variable graph elements by storing the graph parameters and data pairs representing the graph data in a text box. Warmus also discloses tagging the text box so that an interpreter used to generate the page recognizes that the text box represents information to be used to generate the graph. Page 30, lines 25-31. Warmus discloses tagging the text box by assigning an unusual attribute, i.e., color or font, to the text box. Page 8, lines 1-17.

Warmus does not disclose embedding code generated by compiling a placeholder as attributes in the placeholder. The attributes assigned to the text box in Warmus are only used to detect a text box associated with variable graph elements. In Warmus, the text box attributes are not used to embed code associated with a placeholder. The applicant respectfully submits that claim 7 is allowable over Warmus for at least these additional reasons.

c. Claims 27, 28, 31, 39, 42, 43, 46, 47 and 48

Claim 27 is directed to a computer program product that comprises instructions operable to cause a programmable processor to perform method steps directly analogous to those recited in claim 1. Claim 31 is directed to a system that includes means for performing such steps. Accordingly, claims 27 and 31, and claims 28, 39, 42, 43, 46, 47, and 48 which depend from

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claim 27 or 31, are allowable over Warmus for at least the reasons discussed above in the context of claim 1.

5. Response to Rejections Under Section 35 USC §103(a)

Claims 8-10, 23-25, and 29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Warmus, in view of U.S. Patent No. 5,845,303, to Templeman ("Templeman"). The applicant respectfully traverses the rejection.

a. Claims 8-10

Amended claim 8 depends from claim 1 and specifies that the placeholder is a mark-up element.

As discussed above, Warmus fails to disclose, or even suggest, a method in which placeholders having a representative content, that in turn have associated formatting information, are presented by presenting the representative content according to the corresponding associated formatting information, as claim 1 requires. The Examiner cites Templeman as allegedly disclosing the use of mark-up elements as placeholders, which the Examiner admits is not disclosed or suggested in Warmus. However, like Warmus, Templeman does not disclose or suggest the presentation of placeholders by presenting representative content of the placeholders according to associated formatting information.

Templeman discloses using a plurality of tags for text and graphics data to be displayed using a metaform. Col 5, lines 53-56. Templeman discloses using the tags to indicate the frame within the metaframe to which the data is assigned, and using style and formatting information in the tag to modify the style and formatting information of the frame. Page 6, lines 45-48 and Page 6, line 66 – Page 7, line 18. Templeman does not disclose or suggest placeholders having a representative content, with the representative content having associated formatting information, where the placeholders are presented by presenting the representative content according to the corresponding associated formatting information. Because Warmus and Templeman, alone or in combination, fail to disclose or suggest at least these limitations of claim 8, no *prima facie* case

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of obviousness has been established, and claim 8 is allowable. Claims 9, and 10 depend from claim 8 and are therefore allowable for at least the same reasons.

b. Claim 23-25

Amended claim 23 depends from claim 1, specifies that the step of inserting one or more placeholders includes inserting one or more mark-up elements. Accordingly, claim 23 is allowable over Warmus and Templeman for at least the reasons discussed above in the context of claims 8-10. Claims 24, and 25 depend directly or indirectly from claim 23, and are therefore allowable for at least the same reasons.

c. Claim 29

Amended claim 29 is directed to a computer program product that comprises instructions operable to cause a programmable processor to perform method steps directly analogous to those recited in claim 23. Accordingly, claim 29 is allowable over Warmus and Templeman for at least the same reasons discussed above in the context of claim 23.

6. Conclusion

The applicant submits that all claims are in condition for allowance and requests that all claims be allowed.

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Date: _____

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